REMARKS

Claims 1, 3-9, 16, 18-25, 27-29, 37-39, 41-48 are pending in the present application. Claims 1, 3-9, 16, 18-25, 27-29, 37-39, 41-49, and 51 were presented for examination. Claims 49 and 51 have been cancelled by amendment.

In the office action mailed June 12, 2006 (the "Office Action"), the Examiner rejected claims 1, 3-9, 16, 18-25, 27-29, 37-39, 41-49, and 51 under 35 U.S.C. 112, first paragraph. The Examiner further rejected claims 1, 3, 8, 16, 18, 23, 25, 27-29, 37-39, 41-42, 47, and 49 under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,760,017 to Banerjee *et al.* (the "Banerjee patent") in view of U.S. Patent No. 6,864,860 to Zien (the "Zien patent"). Claims 4, 5, 7, 9, 19, 20, 22, 24, 43, 44, 46, 48, and 51 were rejected under 35 U.S.C. 103(a) as being unpatentable over the Banerjee patent in view of the Zien patent, and further in view of U.S. Patent No. 6,347,095 to Tang *et al.* (the "Tang patent").

The Examiner's rejection of claims 49 and 51 are now moot due to the cancellation of these claims.

With respect to the Examiner's rejection of claims 1, 3-9, 16, 18-25, 27-29, 37-39, 41-48 under 35 U.S.C. 112, first paragraph, Applicant disagrees that the current specification is lacking support for the rejected claims. The Examiner argues that the specification fails to explicitly describe a keyboard connector and video connector that are configured to be connected to a keyboard and video device, respectively, in such a way to convey to one ordinarily skilled in the art that the Applicant had possession of the claimed invention.

The Examiner has failed to consider the description found in the Background of the Invention. As described at page 2, lines 8-13, and illustrated in Figure 1, each of the computer systems 102A-N provides operator interface signals 108 that typically include keyboard, video, and mouse signals. As specifically described by the material at page 2, these signals are used to provide input to and receive output from the computer system via a keyboard, video display, and mouse, respectively. With reference to Figure 3 and the corresponding description, the keyboard and video signals are shown to be transmitted between a computer system 304A and a wireless communications module 314A by separate connections. Since the keyboard and video signals that are transmitted between the computer system 304A and the wireless communications module 314A are the same as described in the Background, the computer system 304A must include a keyboard connection configured to be connected to a

keyboard to receive the keyboard signals via a keyboard, as described in the Background. Similarly, the computer system 304A must include a video connector configured to be connected to a video device to provide the video signals to a video monitor, also described in the Background. Thus, Figure 3 illustrates the communications module 314A connected to the computer system 304A through separate keyboard and video connections through which the keyboard and video signals, respectively, are coupled.

Moreover, claim limitations can be supported in the specification through express, implicit, or inherent disclosure. *See* the Manual of Patent Examining Procedure section 2163(I)(B). Although the specification expressly supports the written description requirement for claims 1, 16, 25, and 37, as previously discussed, even if it is assumed for the sake of argument that there is no explicit disclosure in the specification, as argued by the Examiner in the Office Action at page 3, it is well known that a computer system includes a keyboard connector configured to receive keyboard signals (included in the operator interface data signals) from a keyboard and a video connector configured to provide video signals to a video device, otherwise, there would be no way to connect a keyboard or video device to a computer. The use of a keyboard and video device with a computer system are both well known. Consequently, at the very least, the limitations of claims 1, 16, 25, and 37 are implicitly or inherently disclosed.

For the foregoing reasons, the subject matter recited by claims 1, 3-9, 16, 18-25, 27-29, 37-39, 41-48 is adequately described in the specification in accordance with 35 U.S.C. 112, first paragraph, and therefore, the Examiner's rejection of the claims should be withdrawn.

As previously mentioned, claims 1, 3, 8, 16, 18, 23, 25, 27-29, 37-39, 41-42, 47, and 49 have been rejected by the Examiner under 35 U.S.C. 103(a) as being unpatentable over the Banerjee patent in view of the Zien patent.

Claims 1, 16, 25, and 37 have been amended to more clearly recite the differences between the claimed invention and the teachings of the Banerjee and Zien patents. For example, the Banerjee and Zien patents fail to describe system communication devices that are coupled to separate keyboard and video connectors of a respective computer system to provide keyboard signals through the keyboard connector and receive video signals through the separate video connector. As discussed in detail in the previously submitted responses, the Banerjee patent describes a wireless interface device for accessing and controlling a remote host computer. As illustrated in Figure 1 of the Banerjee patent, a wireless interface device 100 is in wireless

communication with a remote host computer 101 through a wireless communication link. The remote host computer 101 includes a transceiver 116 through which the remote host computer 101 communicates with the wireless interface device 100. Examples of the transceiver 116 that are described in the Banerjee patent include a wireless transceiver card that is connected through a PCMCIA interface, and alternatively, an "ISA" card transceiver that is installed in the remote host computer 101 using an ISA expansion slot. *See* col. 4, lines 8-19. In contrast, claims 1, 16, 25, and 37 recite that the system communications devices are coupled through the keyboard and video connectors of a respective computer system, and that keyboard signals are provided through the keyboard connector and the video signals are provided through the video connector. For example, in the embodiment shown in Figure 3, the computer systems 304A-N are coupled to a communications network 306 to form a computer network 308. The wireless communications modules 314A-N are not coupled to a respective computer system 304A-N through the communications network 306, but are coupled through connectors through which the keyboard and video signals are provided and received by the respective computer system 304A-N. An advantage to this arrangement is that no special hardware be added to the computer systems 304A-N since the operator interface signals 312A-N (e.g., keyboard, video, and mouse signals) are standard signals typically utilized to provide operator interface to conventional computer systems. In contrast, the Banerjee patent describes a network arrangement where the wireless interface device 100 is wirelessly connected to the host computer 101 through a network connected wireless access point 109, and not through keyboard and a separate video connector, as recited in the claims.

The Examiner has cited the Zien patent as teaching a wireless interface device transmitting operator interface signals comprising video signals to the host computer. *See* the Office Action at page 6.

The Zien patent describes a method for downloading or "downsyncing" data to a portable device, such as a PDA, by using video images. A client computer 102 displays a series images of a pixel matrix on a video screen 110, which the PDA 106 "captures" by virtue of a digital camera 108. The pixels on the screen represent the data to be downsynced. The "wireless" transmission referred to by the Examiner is essentially performed by using the PDA 108 to take a series of pictures of the pixel encoded data displayed by the client computer 102. The resulting pictures represent data downloaded to the PDA. The Zien patent fails to make up

for the deficiencies of the Banerjee patent as previously described in the present response, as well as the previous responses. For example, the system described in the Zien patent does not include any system communications devices as recited in the claims, nor does the Zien patent teach transmitting operator interface signals comprising video signals. Video images already displayed on the video screen 110 are used to downsync the data to the PDA 106, not video signals that are provided to a video device, as recited in the claims.

Moreover, those ordinarily skilled in the art would not be motivated to modify the teachings of Banerjee by including a digital camera in the wireless interface device 100, which is then used to capture a series of pictures of a screen displaying pixels, in order to transfer data. As previously discussed, the wireless network card described in the Banerjee patent provides a mechanism to transfer data. To modify the wireless mechanism to include a much slower, more error prone method of transferring data such as taking pictures would be contrary to what most of those ordinarily skilled in the art would do.

For the foregoing reasons, claims 1, 16, 25, and 37 are patentable over the Banerjee patent in view of the Zien patent. Claims 1, 3, 6, and 8, which depend from claim 1, claims 18, 21, and 23, which depend from claim 16, claims 27-29, which depend from claim 25, and claims 38, 39, 41, 42, 45, 47, which depend from claim 37, are similarly patentable based on their dependency from a respective allowable base claim. Therefore, the rejection of claims 1, 3, 8, 16, 18, 23, 25, 27-29, 37-39, 41-42, and 47 under 35 U.S.C. 103(a) should be withdrawn.

As previously mentioned, claims 4, 5, 7, 9, 19, 20, 22, 24, 43, 44, 46, and 48 were rejected under 35 U.S.C. 103(a) as being unpatentable over the Banerjee patent in view of the Zien patent, and further in view of the Tang patent.

The Tang patent has been cited by the Examiner has teaching wireless communications between two devices based on proximity, where a device can identify and communicate with a plurality of devices within its proximity. *See* the Office Action at page 18. Even if it is assumed for the sake of argument that the Examiner's characterization of the teachings of the Tang patent art are accurate, these teachings fail to make up for the deficiencies of the Banerjee and Zien patents previously discussed. Therefore, the combined teachings of the Banerjee, Zien, and Tang patents fail to teach or suggest the combination of limitations recited by claims 4, 5, 7, 9, 19, 20, 22, 24, 43, 44, 46, and 48. Therefore, the rejection of these claims under 35 U.S.C. 103(a) should be withdrawn.

All of the claims pending in the present application are in condition for allowance. Favorable consideration and a Notice of Allowance are earnestly solicited.

Respectfully submitted,
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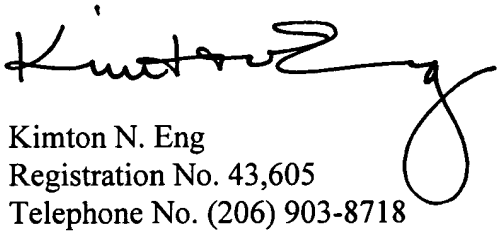

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